

**COMMONWEALTH OF MASSACHUSETTS  
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY**

**BAY STATE GAS COMPANY**

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**D.T.E. 05-27**

**INTERVENOR UNITED STEELWORKERS OF AMERICA, AFL-CIO/CLC'S  
FIRST SET OF INFORMATION REQUESTS<sup>1</sup>**

- USWA-1-1 Identify all Company Departments, Divisions, and Sub-divisions under consideration for outsourcing or a reduction in force from January 1, 2004 to date. For each Department, include the location of the department and the number of employees. List all job classifications in each Department and provide the job descriptions and the number of positions in each classification.
- USWA-1-2 For each of the Departments identified in your response to Request 1, provide all documents informing, consulted in, or relating to the Company's pending decision to reduce or outsource positions within each of these Departments. Identify all agents of the Company responsible for determining whether any Departments will be outsourced.

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<sup>1</sup> In this request, the term "document" or "documents" means the originals and all non-identical copies (whether different from originals by reason of notations made on such copies or otherwise), or in lieu thereof, true and exact copies, regardless of origin or location, of any written, typed, printed, transcribed, taped, recorded, filmed, punched or graphic matter of any kind, type or nature whatsoever, however produced or reproduced, including but not limited to contracts, proposals, statements and invoices, financial books and records, letters or other correspondence, e-mails, telegrams, telex messages, memoranda and notes of telephone conversations, telephone logs, memoranda and notes of meetings and interviews, inter-office communications, instructions, notes, memoranda, reports, summaries, manuals, magnetic tapes, tabulations, records, work papers, research papers, books, journals, microfiche, microfilm, photographic film, surveys, charts, studies, data sheets, desk calendars and diaries, policies, printed matter, telephone logs, work sheets and working papers and all documentary materials of any nature whatsoever.

The term "identify" means, with respect to a natural person, (1) his or her name; (2) his or her current job title, if still employed by the Company, and whether he or she is employed directly by Baystate Gas or NiSource; (4) his or her current business address and telephone number; and, (5) the name and address of his or her current employer, if not currently employed by the Company.

The term "identify" means, with respect to documents, (1) the author thereof and the person or persons to whom the document(s) was originally directed; (2) the source from whom Complainant obtained such document(s); (3) the date of each such document(s); (4) the current custodian of each such document(s); (5) the location at which each such document(s) is situated; and, (6) the subject matter of each such document(s).

- USWA-1-3 For each of the Departments identified in your response to Request 1, provide the itemized operating budgets for FY 2004 and FY 2005 and the estimated itemized operating budget for FY 2006.
- USWA-1-4 Provide all documents informing, consulted in, or related to NiSource's claim, published in its December 2004 Annual Report, that NiSource will save 20-30% of "targeted costs" by outsourcing positions from various departments at the Company and other subsidiaries. This request includes, but is not limited to, all documents demonstrating or suggesting that outsourcing any or all of the employees within any Company Departments identified by Request 1 will provide the NiSource a cost savings.
- USWA-1-5 Provide all proposals made by "outside service providers" to facilitate NiSource's pending decision to outsource personnel. This request includes, but is not limited to, cost estimates, business plans, reports, memoranda, e-mails, dictated meeting notes, and any other documents relating to or regarding "Outside Service Providers" proposals to outsource staff and or modernize business support systems relied upon by the Company in making its decision regarding outsourcing.
- USWA-1-6 Provide all documents informing, consulted in, related to or regarding NiSource's decision to utilize IBM Global Solutions to outsource Company work. This request includes, but is not limited to, all documents relating to or regarding: the use of second tier contractors by IBM to staff call centers, positions within each Department to be eliminated or outsourced, job descriptions for outsourced positions, rates of pay and benefits for comparable contractor positions at either IBM or second tier provider, any agreements over information technology to be provided to the Company, and any documents describing the projected cost savings to be realized through the Company's relationship with IBM Global Services.
- USWA-1-7 Provide NiSource's "Earnings Share Estimate" for 2005. Provide all documents supporting the Company's claim that the reduction in revenue in the 2005 earnings share estimate is due to regulatory proceedings, contract renewals, and increased costs.
- USWA-1-8 To the extent not already provided in response to Request 6, provide all documents in consulted, informing, regarding or relating to NiSource's assertion on page 25 of its SEC Form 10Q (March 31, 2005) that it has contracted with IBM Global Solutions for services totaling up to two billion dollars over 10 years. This

request includes, but is not limited to, a copy of the final agreement between IBM and NiSource.

- USWA-1-9 Provide the number of all customer service complaints at Baystate for each year from 1997 to 2005. Provide a copy of any written complaints and any and all telephone complaint logs.
- USWA-1-10 When were the phone systems at the Springfield call center last replaced/modernized by the Company? What were the replacement/modernization costs? Describe how the replacement costs were budgeted—*i.e.*, were the replacement/modernization contained within the 2004 annual budget, or spread out over several years, how was the replacement funded, were there any corresponding increases in the overall cost of service to customers in preparation for or as a result of the replacement/modernization. If the Springfield call center work were outsourced to IBM Global Solutions, how would the call center phone system be utilized?
- USWA-1-11 From January 1, 1997 to the present, provide the annual compensation and benefits for each executive officer and each Board member of the Company. Include stock options and bonuses. For any executive officer or Board member who separated from the company between January 1, 1997 and the present, provide the total severance package, including any deferred compensation.

Respectfully submitted,

UNITED STEELWORKERS OF  
AMERICA,

By its attorneys,

/s/ Nicole Horberg Decter

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Dated: June 15, 2005

### **CERTIFICATE OF SERVICE**

I hereby certify that on June 15, 2005, I caused a copy of the foregoing discovery request to be served by e-mail upon all individuals listed on the official service list for this case, a copy of which has been attached hereto. Hard copies were sent to the Company and the Department of Telecommunications and Energy by 1<sup>st</sup> class mail.

/s/ Nicole Horberg Decter  
Nicole Horberg Decter